I think the plan to require a new MMSI number when I apply for a FCC Ship Station License is ill conceived.

I bought my boat in Canada. It had an EPIRB and a MMSI enabled VHF. Luckily the previous owner had successfully entered his number on the first try, making my MMSI # entry from Boat US relatively easy to do.

I don't know what the reasoning was behind the need for the original manufacturers to have a two try limit design. However the consequences of it are that if I need to register a new number, I need to rip the unit out of the boat (never easy in a sailboat) and send it back to the manufacturer, where only they can reset the counter (lame design). Aside from the hassle, it also means that I am without a radio during the time it takes to rip it out, find who, where and how to send it to the manufacturer, the time it is there, gets back and is reinstalled. While handhelds work some, their range isn't as good as the fixed VHF with an antennae. Definitely a safety issue where we sail all year round both in the bay and outside the golden gate.

It seems that other solutions are available than requiring a new number. It should be a simple matter to pull in (import) the data off of the existing database. Alternately, the database could permit aliasing the existing number, or the data could be re-entered on the form using the existing number. Anything can be programmed and converted, you are using the wrong people or systems if they tell you it can't be done. No such thing as bad programs, only bad programmers with no imagination, or poor design scope to start with.

Another example is the EPRIB. You'd think that I'd also be able to register my boat's automatically deployed EPRIB as it was made by ACR in Florida, yet with the provincial attitude that each country has to keep there own database, and thus country specific EPIRB IDs, I'm registered in Canada vs. the US. Go figure.

From a design scope you'd expect that search and rescue personnel would want to have transparent access to both EPRIB and MMSI databases and other country's databases. Having yet another stand alone database design just puts people at jeopardy and doesn't make the best use of scarce SAR personnel. If I had an accident, how long would it take and how many incidents would this be when I hit the boat's VHF DSC button, the boat's Canadian registered EPIRB auto deploys, I activate my US registered PLB and when someone is in range of my handheld VHF with DSC, synchronized with my handheld GPS?

From the broadest perspective it is about getting the most people to use the system, to save the most lives, where ever they bought and/or registered their product. This means speed (ease of applying for a number; ease of number entry; ease of change if needed; ease of finding out who is in trouble and where), not having multiple databases that don't communicate and then insisting that users bail out yet another poorly designed relational database.